

Leonard Law, PC
955 South Virginia Street, Suite 220 | Reno, Nevada 89502
775-964-4656 | Debbie@leonardlawpc.com

Debbie Leonard (Nev. Bar #8260)
Leonard Law, PC
955 South Virginia Street, Suite 220
Reno, Nevada 89502
(775) 964-4656
debbie@leonardlawpc.com

Attorney for TRPA and Marsha Berkbigler

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

REUBEN RICHARDS, an individual, and
ROBERT GOLDBERG, an individual,

3:20-cv-00468-RCJ-WGC

Plaintiff,

v.

**STIPULATION TO EXTEND TRPA
DEFENDANTS' TIME TO ANSWER OR
OTHERWISE RESPOND TO THE
COMPLAINT
(Second Request)**

TAHOE REGIONAL PLANNING AGENCY;
MARSHA BERKBIGLER individually and in
her capacity as a Governing Board Member of
the Tahoe Regional Planning Agency; and
GONOWABIE PROPERTIES, LLC, a Nevada
limited liability company,

Defendants.

Plaintiffs REUBEN RICHARDS and ROBERT GOLDBERG, by and through their
counsel of record, Defendants TAHOE REGIONAL PLANNING AGENCY and MARSHA
BERKBIGLER ("TRPA Defendants"), by and through their counsel of record, and Defendant
GONOWABIE PROPERTIES, LLC, by and through its counsel of record, hereby stipulate as
follows:

On August 17, 2020 Plaintiffs filed their Verified Complaint for Declaratory and
Injunctive Relief; and Related Pendant State Law Petition for Writ of Certiorari/Writ of
Mandamus (the "Complaint"). On September 9, 2020 the parties filed a Stipulation to Extend
Defendants' Time to Answer or Otherwise Respond to the Complaint to September 29, 2020,
and the Court entered the Order to that effect on September 10, 2020.

1 This is the second Stipulation to extend the time for TRPA Defendants to answer or
2 otherwise respond to the Complaint. This request for an extension of time is made before the
3 expiration of any deadline to answer or otherwise respond to the Complaint by TRPA
4 Defendants.

5 The reason the parties request this extension is to facilitate further discussions between
6 the parties that may reduce or eliminate certain issues in dispute in the action and to
7 accommodate counsel for the TRPA Defendants, who is facing a number of conflicting
8 deadlines.

9 Accordingly, counsel for all parties agree to extend the time for TRPA Defendants to
10 answer or otherwise respond to the Complaint to October 2, 2020.

11
12 Dated: September 25, 2020

LEONARD LAW, PC

13 By: /s/ Debbie Leonard
14 Debbie Leonard (SBN 8260)
15 955 South Virginia Street, Suite 220
16 Reno, NV 89502
17 (775) 964-4656

Attorney for TRPA Defendants

18 Dated: September 25, 2020

McDONALD CARANO LLP

19 By: /s/ William A.S. Magrath II
20 William A.S. Magrath II (SBN 1490)
21 100 West Liberty Street, 10th Floor
22 Reno, NV 89501
23 (775) 788-2000

*Attorney for Defendant Gonowabie
Properties, LLC*

Leonard Law, PC
955 South Virginia Street, Suite 220 | Reno, Nevada 89502
775-964-4656 | Debbie@leonardlawpc.com

Dated: September 25, 2020

THE GUNDERSON LAW FIRM

By: /s/ Courtney Forster
Courtney G. Forster (SBN 10775)
3895 Warren Way
Reno, NV 89509
(775) 829-1222

Attorney for Plaintiffs

IT IS HEREBY ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: September 28, 2020